

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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BAILAH ABDOULLAH

Write the full name of each plaintiff.

No. \_\_\_\_\_

(To be filled out by Clerk's Office)

-against-

**COMPLAINT**

(Prisoner)

① The City of New York, ② Detective Daniel

Roman

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section IV.

**NOTICE**

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

**I. LEGAL BASIS FOR CLAIM**

State below the federal legal basis for your claim, if known. This form is designed primarily for prisoners challenging the constitutionality of their conditions of confinement; those claims are often brought under 42 U.S.C. § 1983 (against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants).

☒ Violation of my federal constitutional rights

☐ Other: \_\_\_\_\_

**II. PLAINTIFF INFORMATION**

Each plaintiff must provide the following information. Attach additional pages if necessary.

BAJ LAM AS DOLLAM  
First Name Middle Initial Last Name

State any other names (or different forms of your name) you have ever used, including any name you have used in previously filing a lawsuit.

Prisoner ID # (If you have previously been in another agency's custody, please specify each agency and the ID number (such as your DIN or NYSID) under which you were held)

GRJC  
Current Place of Detention

09-09 Hazen street  
Institutional Address

EAST ELMHURST NY 11370  
County, City State Zip Code

**III. PRISONER STATUS**

Indicate below whether you are a prisoner or other confined person:

- ☒ Pretrial detainee  
☐ Civilly committed detainee  
☐ Immigration detainee  
☐ Convicted and sentenced prisoner  
☐ Other: \_\_\_\_\_

**IV. DEFENDANT INFORMATION**

To the best of your ability, provide the following information for each defendant. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are identical to those listed in the caption. Attach additional pages as necessary.

**Defendant 1:**

The City of New York  
 First Name Last Name Shield #  
 \_\_\_\_\_  
 Current Job Title (or other identifying information)  
 \_\_\_\_\_

Current Work Address  
 \_\_\_\_\_

County, City State Zip Code  
 \_\_\_\_\_

**Defendant 2:**

DAN:CI Roman 1267  
 First Name Last Name Shield #  
 \_\_\_\_\_

Detective  
 Current Job Title (or other identifying information)  
 \_\_\_\_\_

81 Precinct  
 Current Work Address  
 \_\_\_\_\_

County, City State Zip Code  
 \_\_\_\_\_

**Defendant 3:**

First Name Last Name Shield #  
 \_\_\_\_\_

Current Job Title (or other identifying information)  
 \_\_\_\_\_

Current Work Address  
 \_\_\_\_\_

County, City State Zip Code  
 \_\_\_\_\_

**Defendant 4:**

First Name Last Name Shield #  
 \_\_\_\_\_

Current Job Title (or other identifying information)  
 \_\_\_\_\_

Current Work Address  
 \_\_\_\_\_

County, City State Zip Code  
 \_\_\_\_\_

**V. STATEMENT OF CLAIM**

Place(s) of occurrence: 39 Ralph Avenue Brooklyn, New York

Date(s) of occurrence: Sept. 10, 2020

**FACTS:**

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and how each defendant was personally involved in the alleged wrongful actions. Attach additional pages as necessary.

See Attached-

Facts of the Incident

On Sept. 10, 2020 I was arrested at a residence for firearm and assault charges. Subsequently, the assault charges were dismissed at Grand Jury.

## Claim #1

## Constitutional

## violation

• Defendants violated Plaintiff's 4th amendment right to not be subjected to an arrest made without Probable Cause.

## How my rights

## were violated

• ON Sept. 10, 2020 I was arrested and charged with 1 count of assault in the first degree and 2 counts of assault in the second degree along with other charges (see Exhibit A). Subsequently, all counts of the assault charges I was charged with on Sept. 10, 2020 were dismissed and I was not indicted on any of the charges in regards to the assault counts (see Exhibit B).

• The arresting officer did not have Probable Cause to arrest me any of the counts associated with the assault charges. The still photos of the video of the incident does not have me anywhere on it, discharging a weapon at the said victim of the incident. Also there is no statements from the victim or the witness stating that I had any involvement in the victim getting injured.

• This detective had no basis to bring these charges against me and these charges were subsequently dismissed. I was falsely arrested for these charges.

## Parties Liable

① The city of New York and ② Detective Daniel Roman

## Claim #2

## Claim type

• Malicious Prosecution

## How my rights were violated

I was charged and arraigned on 1 count of assault in the first degree and 2 counts of assault in the second degree along with other charges (see exhibit A). Subsequently, all counts of the assault charges I was charged with on Sept 10, 2020 were dismissed and I was not indicted on any of the charges in regards to the assault counts (see exhibit B).

The prosecution in the case instead of declining to prosecute because there was no evidence in their possession to connect the Plaintiff with the crime of assault (and the included counts), chose to arraign the Plaintiff on these charges in hopes of manipulating (or altering) the Plaintiff statements made on the day of the arrest to use as an admission of guilt (and ultimately the only evidence connecting the Plaintiff with the alleged crime). In the end, these charges were dismissed against the Plaintiff and he was not indicted on the counts of assault he was initially arraigned on.

## Parties liable

① The City of New York and ② Detective Daniel Roman

③ Prosecuting ADA (if they can be sued in connection with this claim, I will like the court to add this ADA to the list of defendants that is already documented).

**INJURIES:**

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

① Loss of Liberty, ② Mental and Emotional Suffering, ③ Humiliation

**VI. RELIEF**

State briefly what money damages or other relief you want the court to order.

IN suing "The City of New York" for \$10 million dollars in compensatory damages and IN also suing each individual defendant for \$10 million dollars in compensatory damages and \$10 million dollars in punitive damages.



**VII. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I understand that if I file three or more cases while I am a prisoner that are dismissed as frivolous, malicious, or for failure to state a claim, I may be denied *in forma pauperis* status in future cases.

I also understand that prisoners must exhaust administrative procedures before filing an action in federal court about prison conditions, 42 U.S.C. § 1997e(a), and that my case may be dismissed if I have not exhausted administrative remedies as required.

I agree to provide the Clerk's Office with any changes to my address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

1/21/2021  
Dated \_\_\_\_\_

BATMAN  
First Name \_\_\_\_\_ Middle Initial \_\_\_\_\_ Last Name ABDULLAH

09-02 Hazen Street  
Prison Address \_\_\_\_\_

East Elmhurst  
County, City \_\_\_\_\_ State NY Zip Code 11370

\_\_\_\_\_  
Plaintiff's Signature

Date on which I am delivering this complaint to prison authorities for mailing: \_\_\_\_\_

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BACILAH ABDULLAH  
(full name of the plaintiff or petitioner applying (each person must submit a separate application))

-against-

CV ( ) ( )  
(Provide docket number, if available; if filing this with your complaint, you will not yet have a docket number.)

① THE CITY OF NEW YORK AND ② DEFENSIVE  
Daniel Roman  
(full name(s) of the defendant(s)/respondent(s))

APPLICATION TO PROCEED WITHOUT PREPAYING FEES OR COSTS

I am a plaintiff/petitioner in this case and declare that I am unable to pay the costs of these proceedings and I believe that I am entitled to the relief requested in this action. In support of this application to proceed *in forma pauperis* (IFP) (without prepaying fees or costs), I declare that the responses below are true:

1. Are you incarcerated? ☒ Yes ☐ No (If "No," go to Question 2.)  
I am being held at: \_\_\_\_\_

Do you receive any payment from this institution? ☐ Yes ☐ No

Monthly amount: \_\_\_\_\_

If I am a prisoner, see 28 U.S.C. § 1915(h), I have attached to this document a "Prisoner Authorization" directing the facility where I am incarcerated to deduct the filing fee from my account in installments and to send to the Court certified copies of my account statements for the past six months. See 28 U.S.C. § 1915(a)(2), (b). I understand that this means that I will be required to pay the full filing fee.

2. Are you presently employed? ☐ Yes ☒ No

If "yes," my employer's name and address are: \_\_\_\_\_

Gross monthly pay or wages: \_\_\_\_\_

If "no," what was your last date of employment? \_\_\_\_\_

Gross monthly wages at the time: \_\_\_\_\_

3. In addition to your income stated above (which you should not repeat here), have you or anyone else living at the same residence as you received more than \$200 in the past 12 months from any of the following sources? Check all that apply.

- (a) Business, profession, or other self-employment  
(b) Rent payments, interest, or dividends

☐ Yes  
☐ Yes

☒ No  
☒ No

- (c) Pension, annuity, or life insurance payments ☐ Yes ☒ No
- (d) Disability or worker's compensation payments ☐ Yes ☒ No
- (e) Gifts or inheritances ☐ Yes ☒ No
- (f) Any other public benefits (unemployment, social security, food stamps, veteran's, etc.) ☐ Yes ☒ No
- (g) Any other sources ☐ Yes ☒ No

If you answered "Yes" to any question above, describe below or on separate pages each source of money and state the amount that you received and what you expect to receive in the future.

If you answered "No" to all of the questions above, explain how you are paying your expenses:

4. How much money do you have in cash or in a checking, savings, or inmate account? \$ 0
5. Do you own any automobile, real estate, stock, bond, security, trust, jewelry, art work, or other financial instrument or thing of value, including any item of value held in someone else's name? If so, describe the property and its approximate value: NO
6. Do you have any housing, transportation, utilities, or loan payments, or other regular monthly expenses? If so, describe and provide the amount of the monthly expense: NO
7. List all people who are dependent on you for support, your relationship with each person, and how much you contribute to their support (only provide initials for minors under 18): NONE
8. Do you have any debts or financial obligations not described above? If so, describe the amounts owed and to whom they are payable: NO

**Declaration:** I declare under penalty of perjury that the above information is true. I understand that a false statement may result in a dismissal of my claims.

1/21/2021

Dated

Signature

ABDULLAH, RAJAH

Name (Last, First, MI)

Prison Identification # (if incarcerated)

01-09 HAZEN STREET

Address

EAST ELKHURST

City

NY

State

11370

Zip Code

Telephone Number

E-mail Address (if available)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SALAH ABDULLAH  
(full name of the plaintiff/petitioner)

-against-

CV ( ) ( )  
(Provide docket number, if available; if filing this with your  
complaint, you will not yet have a docket number.)

(1) The City of New York, (2) Detective

Daniel Bonain  
(full name(s) of the defendant(s)/respondent(s))

**PRISONER AUTHORIZATION**

By signing below, I acknowledge that:

- (1) because I filed this action as a prisoner,<sup>1</sup> I am required by statute (28 U.S.C. § 1915) to pay the full filing fees for this case, even if I am granted the right to proceed *in forma pauperis* (IFP), that is, without prepayment of fees;
- (2) the full \$350 filing fee will be deducted in installments from my prison account, even if my case is dismissed or I voluntarily withdraw it.

I authorize the agency holding me in custody to:

- (1) send a certified copy of my prison trust fund account statement for the past six months (from my current institution or any institution in which I was incarcerated during the past six months);
- (2) calculate the amounts specified by 28 U.S.C. § 1915(b), deduct those amounts from my prison trust fund, and disburse those amounts to the Court.

This authorization applies to any agency into whose custody I may be transferred and to any other district court to which my case may be transferred.

1/21/2021

Date

Signature

ABDULLAH, Salah  
Name (Last, First, MI)

Prison Identification #

09-09 Hazen Street  
Address

East Elmhurst  
City

NY  
State

11370  
Zip Code

<sup>1</sup> A "prisoner" is "any person incarcerated or detained in any facility who is accused of, convicted of, sentenced for, or adjudicated delinquent for, violations of criminal law or the terms or conditions of parole, probation, pretrial release, or diversionary program." 28 U.S.C. § 1915(h).

EXHIBITS

Name: BILALH abdullah

Date: 1/21/2021

Address, city: 09-09 Hazen St.

State and ZIP: East Elmhurst, NY

11370

EXHIBIT A

CRIMINAL COURT OF THE CITY OF NEW YORK  
PART APAR COUNTY OF KINGS

THE PEOPLE OF THE STATE OF NEW YORK

STATE OF NEW YORK  
COUNTY OF KINGS

V.

BAILAH ABDULLAH

DETECTIVE DANIEL ROMAN SHIELD NUMBER 1267 OF 299 COMMAND SAYS THAT ON OR ABOUT JULY 16, 2020 AT APPROXIMATELY 05:20 PM AT 480 MONROE STREET COUNTY OF KINGS, STATE OF NEW YORK,

THE DEFENDANT COMMITTED THE OFFENSE(S) OF:

PL 120.10(1)	ASSAULT IN THE FIRST DEGREE (DQO)
PL 265.03(1)(B)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE (DQO)
PL 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE (DQO)
PL 120.05(2)	ASSAULT IN THE SECOND DEGREE (DQO)
PL 265.02(1)	CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE (DQO)
PL 265.01(1)	CRIMINAL POSSESSION OF A WEAPON IN THE FOURTH DEGREE
PL 265.01(2)	CRIMINAL POSSESSION OF A WEAPON IN THE FOURTH DEGREE

IN THAT THE DEFENDANT DID:

WITH INTENT TO CAUSE PHYSICAL INJURY TO ANOTHER PERSON, CAUSE SUCH INJURY TO SUCH PERSON OR TO A THIRD PERSON BY MEANS OF A DEADLY WEAPON OR A DANGEROUS INSTRUMENT; WITH INTENT TO CAUSE SERIOUS PHYSICAL INJURY TO ANOTHER PERSON, CAUSE SUCH INJURY TO SUCH PERSON OR TO A THIRD PERSON BY MEANS OF A DEADLY WEAPON OR A DANGEROUS INSTRUMENT; POSSESS ANY FIREARM, ELECTRONIC DART GUN, ELECTRONIC STUN GUN, SWITCHBLADE KNIFE, PILUM BALLISTIC KNIFE, METAL KNUCKLE KNIFE, CANE SWORD, BILLY, BLACKJACK, BLUDGEON, PLASTIC KNUCKLES, METAL KNUCKLES, CHUKA STICK, SAND BAG, SANDCLUB, WRIST-BRACE TYPE SLINGSHOT OR SLUNGSHOT, SHIRKEN OR KUNG FU STAR; POSSESS ANY DAGGER, DANGEROUS KNIFE, DIRK, MACHETE, RAZOR, STILETTO, IMITATION PISTOL, OR ANY OTHER DANGEROUS OR DEADLY INSTRUMENT OR WEAPON WITH INTENT TO USE THE SAME UNLAWFULLY AGAINST ANOTHER; COMMIT THE CRIME OF CRIMINAL POSSESSION OF A WEAPON IN THE FOURTH DEGREE AS DEFINED IN SUBDIVISION ONE, TWO, THREE OR FIVE OF PENAL LAW SECTION 265.01, AND HAD BEEN PREVIOUSLY CONVICTED OF ANY CRIME; WITH INTENT TO USE UNLAWFULLY AGAINST ANOTHER, POSSESS A LOADED FIREARM; POSSESS ANY LOADED FIREARM AND THAT SUCH POSSESSION DID NOT TAKE PLACE IN DEFENDANT'S HOME OR PLACE OF BUSINESS;.

THE SOURCE OF DEPONENT'S INFORMATION AND THE GROUNDS FOR DEPONENT'S BELIEF ARE AS FOLLOWS:

THE DEPONENT STATES THAT THE DEPONENT REVIEWED SURVEILLANCE VIDEOS DEPICTING THE ABOVE TIME AND PLACE, AND SAID VIDEOS DEPICT THE DEFENDANT DISPLAY WHAT APPEARS TO BE A FIREARM AT AN INDIVIDUAL KNOWN TO THE NYPD AND KINGS COUNTY DISTRICT ATTORNEY'S OFFICE AND FLED THE ABOVE PLACE, AND FURTHER DEPICTS DEFENDANT PLACE A BANDANA INSIDE THE WHEEL WELL OF A PARKED WHITE VEHICLE AND FLED.

THE DEPONENT IS INFORMED BY EVIDENCE COLLECTION TEAM POLICE OFFICER LACE KIRK-FREDRICKSON THAT THE INFORMANT RECOVERED FOUR 40 CALIBER SHELL CASINGS FROM THE SIDEWALK OF THE ABOVE PLACE, AND THE INFORMANT FURTHER RECOVERED A 40 CALIBER BLACK GLOCK HANDGUN, BEARING SERIAL NUMBER PTD712, FROM SAID BANDANA LOCATED INSIDE THE WHEEL WELL OF THE ABOVE PARKED WHITE VEHICLE.

THE DEPONENT IS INFORMED BY DR. STEFFY JOSE THAT THE INDIVIDUAL KNOWN TO THE NYPD AND KINGS COUNTY DISTRICT ATTORNEY'S OFFICE SUSTAINED A GUNSHOT WOUND TO THE MOUTH, CAUSING MULTIPLE LACERATIONS TO THE MOUTH, TONGUE, AND CAUSED A MANDIBLE FRACTURE TO THE JAW.





## OFFICE OF THE DISTRICT ATTORNEY, KINGS COUNTY

RENAISSANCE PLAZA at 350 JAY STREET  
BROOKLYN, N.Y. 11201-2908  
(718) 250-2000

ERIC GONZALEZ  
District Attorney

**Complaint Room Screening Sheet**

Riding Case  
Qualifying Offense

Screeners: Christopher Brogna  
Screening date: September 10, 2020  
180.80 Date: 09/14/20  
GJ Date: 09/14/20

Bureau: Trial Bureau 3 - Gray

Narcotics: ☒ N

GJ Time: 09:00

**Defendants**

Name - Last, First	Arrest Number	Sex	DOB	Age	AO	Complaint/DP	Class	
ABDULLAH, BAILAH	K20627805	M	08/12/92	028		1	Felony	Grand Jury
Gang member <input type="checkbox"/>								

**TPOs**

Date/Time	Place	PCT	Near School (if narcotics sale)
1 07/16/20 17:20 to:	480 MONROE STREET	081	<input type="checkbox"/>

**Arrests**

Defendant	Date/Time	Place
ABDULLAH, BAILAH	09/10/20 13:00	30 RALPH AVENUE
Circumstances:		
Arrest Charges: PL 1200501 PL 1252501 PL 265031B		

**Complaint Charges**

ABDULLAH, BAILAH TPO 1 PL 120.05(2), PL 120.10(1), PL 265.01(1), PL 265.01(2), PL 265.02(1), PL 265.03(1)(B), PL 265.03(3)

**ASSAULT 1 SHOOTING/DEF SHOTS CW IN MOUTH (GUN AND BULLETS RECOVERED)(ADMISSION)**

LOCATION: PUBLIC STREET  
CW AND DEF ARE STRANGERS

AT TPO,  
CW WENT TO LOCATION AND CONFRONTED A GROUP OF UNKNOWN INDIVIDUALS INCLUDING DEF'S BROTHER. DEF WAS  
ALSO AT LOCATION BUT NOT AMONG THE GROUP OF INDIVIDUALS

CW REACHED FOR A FIREARM FROM CW'S POCKET AND DISPLAYED A FIREARM

DEF'S BROTHER PUNCHED CW ABOUT THE FACE AND FLED LOCATION

CW CHASED AFTER DEF'S BROTHER AND DISCHARGED CW'S FIREARM TOWARDS DEF'S BROTHER BUT MISSED

DEF PULLED OUT A FIREARM AND BEGAN SHOOTING AT CW AND 1 BULLET STRUCK THE CW IN THE JAW

DEF AND CW FLED LOCATION

DEF FLED UP THE BLOCK AND PLACED A BANDANA INSIDE A WHEEL WELL OF A PARKED VEHICLE

MULTIPLE 911 CALLS WERE MADE

NYPD RESPONDED TO LOCATION AND OBSERVED FOUR 40 CAL SHELL CASINGS IN FRONT OF 480 MONROE STREET AS  
WELL AS BLOOD DROPLETS IN FRONT OF 315 MARCUS GARVEY BLVD

A CIVILIAN OBSERVED SAID BANDANA WITH A FIREARM WRAPPED IN IT AND WALKED DOWN THE BLOCK TO PO SUAREZ  
AND DIRECTED PO SUAREZ TO SAID FIREARM

ECT PO KIRK-FREDRICKSON RESPONDED TO PARKED VEHICLE AND RECOVERED SAID FIREARM FROM THE WHEEL WELL.  
ECT RUN #2020/1813

AO RESPONDED TO THE SCENE AND CANVASSED LOCATION FOR SURVEILLANCE VIDEO

AO OBTAINED SURVEILLANCE VIDEOS FROM LOCATION

SURVEILLANCE VIDEO DEPICTS SHOOTING, DEF, DEF'S BROTHER AND CW FLEEING LOCATION, DEF PLACING A BANDANA  
INSIDE THE WHEEL WELL OF A PARKED VEHICLE, AND SAID CIVILIAN DIRECTING PO SUAREZ TO THE BANDANA INSIDE THE  
WHEEL WELL OF SAID PARKED VEHICLE

ON 9/5/20

AO INTERVIEWED EW. EW ID'ED DEF FROM STILL PHOTOS FROM THE SURVEILLANCE VIDEOS

AO ISSUED AN I CARD FOR DEF

9/10/20

DET WALSH FROM WARRANTS APPREHENDED DEF AT DEF'S PAROLE OFFICE CHECK IN

AO DEBRIEFED DEF. DEF WAS READ MIRANDA AND DEF WAVED SAID RIGHTS.

DEF STATED, IN SUM AND SUBSTANCE, I WAS HIT BY A CAR IN JULY, I HAD A CONCUSSION. I HAVE A TWIN BROTHER, I  
WAS THERE, I DON'T KNOW WHO HE HAD A PROBLEM WITH. I RISK MY LIFE EVERYDAY IN THE STREET CAUSE HE'S MY  
TWIN RIGHT. I GO THROUGH SHIT CAUSE OF HIM, PEOPLE THINKING I'M HIM. I'M ON PAROLE FOR ROBBERY. THE ONLY  
THING I DO IS SMOKE WEED. ON MY RECORD I ONLY GOT THAT ROBBERY. I'M NOT AN ASSHOLE I TRY TO STAY OUTTA  
TROUBLE. PEOPLE DYIN OUT HERE THERE'S A WHOLE LOT GOING ON. I WENT UP TO MY BROTHER TO SEE WHAT WAS  
GOING ON, I WASN'T TOO FOCUSED ON THAT SITUATION I WAS ON MY PHONE TEXTING MY GIRL. I ASKED HIM WHAT WAS  
GOING ON I PROBABLY WAS ASKING HIM ANYTHING. HE PROBABLY CONFRONTED HIM ABOUT SOMETHING. LIKE I SAID I  
DON'T KNOW WHAT HE DO ON THE STREET, THAT'S ME IN THE PHOTO. I WAS BACK OFF EIGHTY FEET LONGER THE

Arrest Numbers: K20627805

Printed 9/11/2020



EXHIBIT B

I N D I C T M E N T

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

THE PEOPLE OF THE STATE OF NEW YORK

AGAINST

INDICTMENT NO. 1376-2020  
GREY ZONE

10-B

J. BAILAH ABDULLAH - AFO, VFO  
DEFENDANT  
CR-017216-20KN

Docket to Assault

COUNTS

CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE  
CRIMINAL POSSESSION OF A FIREARM  
CRIMINAL POSSESSION OF A WEAPON IN THE FOURTH DEGREE

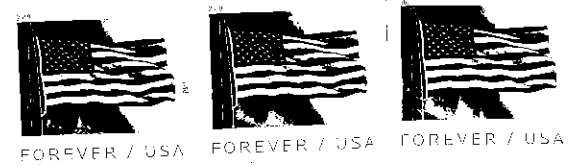
A TRUE BILL

FOREPERSON

Eric Gonzalez  
DISTRICT ATTORNEY

CRIMINAL TERM ARR/HOT  
SUPERIOR COURT KINGS  
2021 SEP 22 PM 4:17

Bailah Abdullah  
#1412002353  
09-09 Hazen Street East  
Gammurst, New York 11370



USPS  
SDNY

RECEIVED - 3 PM 1:46

Pro Se Office  
United States District Court  
Southern District of New York  
500 Pearl Street, New York, NY 10007

